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Remarks**RECEIVED
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Reconsideration of the application and allowance of all pending claims are respectfully requested. Claims 1-10 are pending.

Applicant's arguments presented below focus on certain patentable differences between the invention as claimed and the applied references. However, it is not to be inferred that the failure to argue all differences between the claimed subject matter and the applied references constitutes acceptance of assertions made in the Office Action of alleged similarities between elements of the claimed subject matter and the applied references.

Claim Rejections - 35 U.S.C. §103

Claims 1-10 were rejected under 35 U.S.C. §103 as being anticipated by Schessel (U.S. Patent No. 6,304,566) in view of Ress (U.S. Patent No. 6,885,658). This rejection is respectfully traversed.

On page 5 of the Office Action, section (C) addressed applicant's previously presented arguments:

"The gateway 32 [of Schessel] converts the TCP/IP address to the called party's telephone directory number which is output from the gateway 32 to a trunk unit 23 of a central office. That is, it is the purpose of router server 30, which is external of the central office 16a, to provide the conversion between a telephone directory number and a corresponding TCP/IP address."

The relevance of the above is that Schessel requires a gateway that is external of the central office in order to support IP based telephony services. Such a requirement is similar to the IP PBX described as prior art in the background of the subject application, i.e. a required external device needed to support IP based telephony services.

In addressing this argument, the Examiner acknowledges that the IPPU, applications processor and packet line trunk of claim 1 are internal to the PSTN switch of claim 1. That is, all elements

that support IP telephony services are contained within the PSTN of claim 1.

In an attempt to rebut this distinction, it is stated in section (C):

“Other components for processing the call feature request are not found in the claim 1 and 6 to be recited as internal to the PSTN switch.”

Such a position does not constitute prima facie grounds and/or reasoning that could support a 103 rejection. First, **no other devices are needed to support the described IP telephony services provided by the PSTN switch not part of the elements/limitations of claim 1**, and hence there are no “other components” to be considered. That is, unlike Schessel, the method of claim 1 DOES NOT need an external router/device to translate IP addresses/directory numbers. Further, it is basic to claim interpretation that it is only those elements and limitations in the claim that are to be considered versus the teaching of the prior art applied during prosecution. The fact that Schessel requires an external router to translate the IP addresses and directory numbers for the central office would be understood by one of ordinary skill in the art as not meeting the requirements of claim 1.

Also relevant to this same subject, claim 1 recites that a first IP packet originated by the one subscriber is received at the IPPU of the PSTN switch where the first IP packet contains a first call feature and the telephone directory number of the called party. This limitation is not taught by Schessel since it teaches that the external router server 30 is needed to translate the IP addresses/directory numbers, and hence the router/server would have to be the originator of any packet containing the directory number. Hence, in Schessel, a directory number received by the central office cannot have been in a packet originated by a subscriber since the router server 30 will have to originate a packet containing this information. Therefore, since Ress is not relevant to this issue, Schessel does not teach the required limitations of claim 1 and the 35 U.S.C. 103 rejection of claim 1 should be withdrawn.

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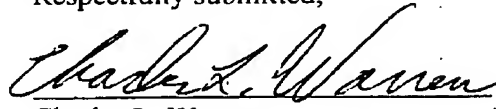
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Claim 6 is believed to be allowable for similar reasons as stated above for claim 1.

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Withdrawal of the 35 U.S.C. 103 rejection of all claims is requested.

Respectfully submitted,



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